

# EXHIBIT

## I

Declaration of

Tim Williams

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE**

**MARY PHILLIPA SLEDGE, MARY JANE  
PIDGEON SLEDGE TRUST, and PIDGEON SLEDGE FAMILY  
LIMITED PARTNERSHIP**

**Plaintiffs,**

**v.**

**Civ. 2:13-cv-2578**

**INDICO SYSTEM RESOURCES, INC. and  
CLEAL WATTS, III**

**Defendants.**

**DECLARATION OF TIMOTHY D. WILLIAMS**

I, Timothy D. Williams, pursuant to the provisions of 28 U.S.C. §1746, do hereby declare:

1. I am an adult resident of Atlanta, Georgia and have personal, firsthand knowledge of the facts described herein.

2. In early 2009, I was introduced to Defendant Cleal Watts, III by an individual named James Weathered.

3. Around this time, I discussed with Mr. Watts several real estate financing opportunities, none of which ever reached fruition.

4. I nevertheless continued to communicate with Watts, directly and through a non-party individual named Mr. John Chu.

5. Mr. Chu frequently functioned as the primary point of contact between me and Mr. Watts.

6. Mr. Chu represented to me that Mr. Watts was an individual of significant means who managed a portfolio of millions of dollars for private investors.

7. In 2009, Mr. Watts told me about an investment opportunity involving the purchase of gold dust directly from a tribal chief in Africa.

8. Mr. Watts told me he needed \$50,000 to close the deal and have the shipment delivered to the United States.

9. He explained that this \$50,000 was an investment and promised me a twenty percent (20%) return on my investment.

10. In reliance on these representations, I invested \$50,000 with Mr. Watts in 2009.

11. Mr. Watts never produced any gold and I never saw any profit. Additionally, I did not get any of my money back.

12. To date, I have not seen any gold or any money from Watts or any of his affiliates.

13. Over the course of years, Mr. Watts gave me several different excuses about why the deal was not working. Among these, he told me that people at customs were trying to steal the shipment, that a volcano eruption had caused the delay, and that a shipment was en route but simply never arrived.

14. Eventually, Mr. Watts stopped responding to my requests for information all together.


15. I determined at the time that I had been scammed, but did not have the means to pursue legal relief.

16. I feel today, as I felt then. I feel embarrassed, hurt, and angry. I should not have trusted him with that money and could not afford to lose it.

17. I still have not fully recovered from that loss.

18. I hope legal action will be taken so that Mr. Watts does not cause financial ruin or hardship to anyone else due to his scams.

I certify under penalty of perjury that the foregoing is true and correct. Executed on this 29 day of October, 2015.

  
TIMOTHY D. WILLIAMS